

EXHIBIT C

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

FRANCIS DADDONA

VS.

TARGET CORPORATION, Alias John Doe

:
:
:
:
:

C.A. NO.

COMPLAINT

1. The Defendant, TARGET CORPORATION, on or about February 6, 2019 operated a retail store at 371 Putnam Pike, Suite A-250 located at Town, located in the Town of Smithfield, County of Providence, State of Rhode Island, and at all times mentioned herein was in possession and control and operated and maintained said premises as well as managed it.

2. That on or about the 6th day of February, 2019 the Plaintiff, FRANCIS DADDONA, was lawfully on the Defendant's said premises in the stock room as he was employed by Northeast Beverage and had just finished stocking and checking his items and was leaving the store through the stock room.

3. At the time and place aforesaid, the Defendant was negligent in having maintained the stock room, specifically the area around exit door in a dangerous, defective, unfit, unsafe and negligent manner because among other things there was a open box in the doorway left by Defendant's employee. Also the Defendant was negligent in failing to adequately warn the Plaintiff of said danger and negligent in failing to adequately inspect the premises. As a result of the Defendant's negligence, the Plaintiff was caused to suffer a fall.

4. The Defendant knew or should have known that the condition of the stock room near the doorway was dangerous to persons walking on it.

5. The Plaintiff was at all times in the exercise of due care and caution.

6. That as a direct and proximate result of the Defendant's negligence, as aforesaid, the Plaintiff sustained personal injuries and emotional harm which incapacitated him, causes him suffering and pain; he incurred, is continuing to incur, and in the future will incur expenses for medical and hospital care and attention; he was unable to perform his usual occupation and lost wages, salaries and/or earnings, and also suffered a loss in earning capacity and scarring of loss of use.

WHEREFORE, the Plaintiff demands judgment against the Defendant, plus costs and interest. The monetary amount claimed is sufficient to establish the jurisdiction of the Superior Court.

The Plaintiff demands trial by jury.

By Plaintiff's Attorney,

/s/ Henry S. Monti

HENRY S. MONTI, ESQ #2745
GEMMA LAW ASSOCIATES, INC.
231 RESERVOIR AVENUE
PROVIDENCE, RI 02907
TELEPHONE: (401) 467-2300
FACSIMILE: (401) 467-8678
E-MAIL: Henry@GemmaLaw.com

DATED: NOVEMBER 4, 2021



STATE OF RHODE ISLAND
SUPERIOR COURT
SUMMONS

Plaintiff FRANCIS DADDONA v. TARGET CORPORATION Defendant	Civil Action File Number PC-2021-06827 Attorney for the Plaintiff or the Plaintiff Henry S. Monti Address of the Plaintiff's Attorney or the Plaintiff GEMMA LAW ASSOCIATES INC 231 RESERVOIR AVENUE PROVIDENCE RI 02907
Licht Judicial Complex Providence/Bristol County 250 Benefit Street Providence RI 02903 (401) 222-3250	Address of the Defendant 1000 NICOLLET MALL MINNEAPOLIS MN 55403

TO THE DEFENDANT, TARGET CORPORATION:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 11/4/2021.	/s/ Stephen Burke Clerk
--	----------------------------

Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND
SUPERIOR COURT

Plaintiff

FRANCIS DADDONA

v.

TARGET CORPORATION

Defendant**Civil Action File Number**

PC-2021-06827

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, TARGET CORPORATION, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.
 Name of person of suitable age and discretion _____
 Address of dwelling house or usual place of abode _____
 Age _____
 Relationship to the Defendant _____
- ☐ With an agent authorized by appointment or by law to receive service of process.
 Name of authorized agent _____
 If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.
 Name of person and designation _____
- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.
- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.
 Name of person and designation _____



STATE OF RHODE ISLAND
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: ____ / ____ / ____
Month Day Year

SERVICE FEE \$ _____

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

FRANCIS DADDONA

VS.

TARGET CORPORATION, Alias John Doe

:
:
:
:
:

C.A. NO. PC-2021-06827

REQUEST FOR JURY TRIAL

Now comes the Plaintiff in the above-entitled matter and request a jury trial.

By Plaintiff's Attorney,

/s/ Henry S. Monti

HENRY S. MONTI, ESQ #2745
GEMMA LAW ASSOCIATES, INC.
231 RESERVOIR AVENUE
PROVIDENCE, RI 02907
TELEPHONE: (401) 467-2300
FACSIMILE: (401) 467-8678
E-MAIL: Henry@gemmalaw.com

DATED: NOVEMBER 4, 2021



STATE OF RHODE ISLAND
SUPERIOR COURT
SUMMONS

Plaintiff FRANCIS DADDONA v. TARGET CORPORATION Defendant	Civil Action File Number PC-2021-06827
	Attorney for the Plaintiff or the Plaintiff Henry S. Monti
	Address of the Plaintiff's Attorney or the Plaintiff GEMMA LAW ASSOCIATES INC 231 RESERVOIR AVENUE PROVIDENCE RI 02907
Licht Judicial Complex Providence/Bristol County 250 Benefit Street Providence RI 02903 (401) 222-3250	Address of the Defendant 1000 NICOLLET MALL MINNEAPOLIS MN 55403 PLEASE SERVE: CT CORPORATION SYSTEM 450 VETERANS MEMORIAL PARKWAY, SUITE 7A EAST PROVIDENCE, RI 02914

TO THE DEFENDANT, TARGET CORPORATION:

The above-named Plaintiff has brought an action against you in said Superior Court in the county indicated above. You are hereby summoned and required to serve upon the Plaintiff's attorney, whose address is listed above, an answer to the complaint which is herewith served upon you within twenty (20) days after service of this Summons upon you, exclusive of the day of service.

If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Your answer must also be filed with the court.

As provided in Rule 13(a) of the Superior Court Rules of Civil Procedure, unless the relief demanded in the complaint is for damage arising out of your ownership, maintenance, operation, or control of a motor vehicle, or unless otherwise provided in Rule 13(a), your answer must state as a counterclaim any related claim which you may have against the Plaintiff, or you will thereafter be barred from making such claim in any other action.

This Summons was generated on 11/4/2021.	/s/ Stephen Burke Clerk
--	----------------------------

Witness the seal/watermark of the Superior Court



STATE OF RHODE ISLAND
SUPERIOR COURT

Plaintiff

FRANCIS DADDONA

v.

TARGET CORPORATION

Defendant

Civil Action File Number

PC-2021-06827

PROOF OF SERVICE

I hereby certify that on the date below I served a copy of this Summons, complaint, Language Assistance Notice, and all other required documents received herewith upon the Defendant, TARGET CORPORATION, by delivering or leaving said papers in the following manner:

- ☐ With the Defendant personally.
- ☐ At the Defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person of suitable age and discretion _____

Address of dwelling house or usual place of abode _____

Age _____

Relationship to the Defendant _____

- ☒ With an agent authorized by appointment or by law to receive service of process.

Name of authorized agent CIT CORPORATION Prop Box 450 Veterans MEM. PKWY E. Prov, RI 02901 11-4-21 12:28 PM

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

- ☐ With a guardian or conservator of the Defendant.

Name of person and designation _____

- ☐ By delivering said papers to the attorney general or an assistant attorney general if serving the state.

- ☐ Upon a public corporation, body, or authority by delivering said papers to any officer, director, or manager.

Name of person and designation _____



STATE OF RHODE ISLAND
SUPERIOR COURT

Upon a private corporation, domestic or foreign:

☐ By delivering said papers to an officer or a managing or general agent.

Name of person and designation _____

☐ By leaving said papers at the office of the corporation with a person employed therein.

Name of person and designation _____

☐ By delivering said papers to an agent authorized by appointment or by law to receive service of process.

Name of authorized agent _____

If the agent is one designated by statute to receive service, further notice as required by statute was given as noted below.

☐ I was unable to make service after the following reasonable attempts: _____

SERVICE DATE: 11 / 4 / 21
Month Day Year

SERVICE FEE \$ 45

Signature of SHERIFF or DEPUTY SHERIFF or CONSTABLE

Anthony Cappalli #157

SIGNATURE OF PERSON OTHER THAN A SHERIFF or DEPUTY SHERIFF or CONSTABLE MUST BE NOTARIZED.

Signature _____

State of _____

County of _____

On this _____ day of _____, 20____, before me, the undersigned notary public, personally appeared _____ ☐ personally known to the notary or ☐ proved to the notary through satisfactory evidence of identification, which was _____, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his or her knowledge.

Notary Public: _____

My commission expires: _____

Notary identification number: _____